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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RONNIE GILL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

PERRY JOHNSON & ASSOCIATES, INC.

And

NORTHWELL HEALTH, INC.,

Defendants.

CASE NO.: 2:23-cv-01851

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF RONNIE GILL'S
COMPLAINT**

(SECOND REQUEST)

Plaintiff Ronnie Gill, individually and on behalf of all others similarly situated, ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiff filed the Complaint on November 10, 2023 and served Northwell on November 17, 2023 and PJ&A on December 5, 2023, respectively.

On December 8, 2023, Plaintiff filed a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings

1 Pursuant to 28 U.S.C. § 1407 (the “Motion”) in the Judicial Panel on Multidistrict Litigation
2 (“JPML”). *See In re Perry Johnson & Associates Medical Transcription Data Security Breach*
3 *Litigation*, Case MDL No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the
4 potential consolidation and transfer of at least forty-five related putative class action complaints.
5 The JPML heard oral arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party—including Plaintiff and Defendants—has agreed
10 that centralization is proper, the primary question for the JPML is *where* to centralize the cases, not
11 *whether* to centralize them.

12 Plaintiff and the Defendants consent to this request. This is the second request for extension
13 of time for this deadline. The parties respectfully submit that there is good cause for this extension
14 and the requested extension is not for the purpose of delay.

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17 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER

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Dated: January 26, 2024.

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Dated: January 26, 2024.

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Despite the parties' failure to include an appropriate signature block as required by Local Rule, overlooked on this one occasion, IT IS HEREBY ORDERED that the Stipulation for Extension of Time (ECF No. 20) is GRANTED.


U.S. MAGISTRATE JUDGE

Dated: January 26, 2024